

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**OBJECTIONS OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES APWU/USPS-T1-1(d&e) AND T1-2**  
(August 22, 2011)

The United States Postal Service hereby objects to American Postal Workers Union interrogatories APWU/USPS-T1-1(d&e) and T1-2, dated August 15, 2011. The interrogatories are repeated below and followed by a statement of the basis for the objections.

**APWU/USPS-T1-1** Please refer to Library Reference USPS-LR-N2011-1/2. For each facility listed in this Library Reference please provide:

- (d) the type (post office, CPU, approved shipper, stamps on consignment, etc.) and hours of operation of each of the “five postal retail and/or alternate access sites” of each facility listed in this Library Reference; and
- (e) the driving distance and driving time between each facility listed in this Library Reference and its corresponding five “postal retail and/or alternate access sites.”

The RAO Initiative is focused on approximately 3650 retail facilities that meet one of four sets of criteria specified in USPS-T-1, at pages 14-17. The request raises the issue of whether discontinuance of retail operations at these facilities would result in changes in the nature of postal services that would be consistent with applicable policies of title 39, United States Code.

Extensive discovery seeking information pertinent to these facilities is underway and the Postal Service is striving to respond as expeditiously as possible. That discovery includes Presiding Officer's Information Request No. 1, Question 14 (August 2, 2011), which directs the Postal Service to provide the driving distance between each

of the 3650 RAO candidate facilities and its "nearest neighbor" Post Office, station, or branch. As indicated in various interrogatory responses, determination of driving distances is a process that involves review and validation of data in the USPS electronic Facilities Management System (EFMS) that are based on latitude/longitude geographic coordinates. Because EFMS data are not always an accurate representation of driving distance, EFMS data must be checked against third-party mapping software, local postal management knowledge, other mapping sources and, on occasion, an odometer test. See the response to PR/USPS-T1-6(e). The cumulative effort associated with performing this validation during the orderly course of 3650 separate discontinuance reviews in 70 District offices is not insignificant. This discrete task ordinarily would be performed as one of many during the course of each of the facility-specific reviews that are currently underway or in the queue to be conducted. Instead, in order to be responsive to Question 14, the Postal Service has directed that discontinuance review personnel in the field halt the orderly conduct of ongoing studies for which they are responsible in order to perform -- out-of-sequence -- one of the tasks that would eventually have been completed during the case-by-case discontinuance review data gathering process for each study in the months ahead. It is estimated that each validation of eFMS data will take at least two to three minutes to perform. Additional time is necessary to compile the efforts of the various District offices into a single response to Question 14. This work is ongoing and is expected to be completed in time for filing a week from today.

Interrogatories APWU/USPS-T1-1(d&e) are objectionable, not because they lacks the safe harbor of being redundant of a Presiding Officer's Information Request,

but because they would impose an undue burden on the Postal Service that is (a) well in excess of the extraordinary undertaking already required to complete the response to POIR 1, Question 14, and (b) well in excess of the value that the facility-specific information sought by T1-1(d&e) would bring to this proceeding.

Interrogatories T1-1(d&e) are overbroad. Proximity of a five nearby alternate (including postal) retail access points within a specified range is not a criterion applicable to the more than 2800 "low earned workload" Post Offices<sup>1</sup> or the more than 260 facilities whose discontinuance studies have been carried over into the RAO Initiative for completion.<sup>2</sup> Accordingly, it is not clear what purpose would be served by imposing on the Postal Service the burden of production of facility-specific information relevant to a criterion that explicitly does not apply to over 3000 of the facilities within the scope of the RAO Initiative. For the approximately 600 stations, branches and annexes to which the alternate retail proximity criteria apply, the Postal Service will be filing a Library Reference tomorrow which indicates for each facility the number of postal retail locations, Contract Postal Units, stamps on consignment locations and Approved Shippers that were determined to be within the specified proximity radius (based on latitude/longitude) and that resulted in that facility becoming an RAO Initiative candidate for review. It should be emphasized that this Library Reference does not contain driving distances between the candidate facility and the various alternate locations. That information will be developed on a facility-by-facility basis as the various postal District

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<sup>1</sup> USPS-T-1at 14.

<sup>2</sup> USPS-T-1at 17.

discontinuance review teams compile data in connection with the facilities for which each is responsible for analyzing as part of the RAO Initiative in the months ahead.

It is estimated that a *minimum* of 10 minutes of work would need to be performed for each of the 3650 RAO candidate facilities to compile estimated driving distances, before the information could then be organized for presentation as an integrated interrogatory response. Thus, *at least* six hundred hours of work would need to be performed for the purpose of responding to APWU's request for the driving distance from each of the 3650 RAO candidate facilities to five nearby alternate retail locations or access channels. However, most of the information sought by APWU/USPS-T1(d&e) is publicly available via the *Find USPS Locations* function at the USPS customer website - *www.usps.com*.<sup>3</sup> That function allows members of the public -- or intervenors in this docket -- to type in a 5-digit ZIP Code or street address, set a proximity range,<sup>4</sup> and find the name, address, directions to, and estimates of distance and drive time to the nearest:

- *Post Office* [, station and branch] *Locations*

- *Alternate Locations to Buy Stamps*

- *Approved Postal Providers* [CPUs, consignment, retail alliance partners]

Hours of retail operations for Post Offices, stations and branches are available by clicking on the name of any postal facility that shows up in the *Post Office Locations* function. The Postal Service does not have a centralized data base that reflects the retail hours of each non-postal alternate access channel. And the *Approved Postal*

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<sup>3</sup> With the exception of two items: the daily hours of operation for alternate (non-postal) retail sites and Approved Shipper locations.

<sup>4</sup> Of 1, 5, 10 or additional increments of miles.

*Providers* in the *Find USPS Locations* data base do not yet include Approved Shippers.

To the extent that such information is relevant to the RAO discontinuance review process, it is collected and analyzed as part of the evaluation of alternate access channels during each facility-specific discontinuance evaluation. Compilation of such information for each of the 3650 RAO candidate facilities by the Postal Service is a task that would impose an additional burden of a magnitude similar to that to which the Postal Service has objected above.

APWU is free to compile and organize the available data described above that are within the scope of APWU/USPS-T1-1(d&e). The purpose of discovery in Commission proceedings is not to transfer to the Postal Service the burdensome task of compiling and organizing already publicly available data that may be relevant to issues in a Commission docket. Accordingly, the Postal Service should not be required to bear the extraordinary burden of accelerating portions of the discontinuance review data collection process for RAO candidate facilities or otherwise compiling information responsive to APWU/USPS-T1(d&e) that is already accessible to APWU.

**APWU/USPS-T1-2**

For each retail facility not selected for study under RAO please provide:

- (a) the hours of operation;
- (b) both the facility finance number and corresponding main office finance number, e.g., the finance number assigned to a station and the corresponding finance number for the main post office to which the station reports;
- (c) the street address; and
- (d) the revenue and expenses.

Rather than seek information on the facilities under review in this docket, this interrogatory seeks facility-specific data for each of the approximately 28,000 retail facilities that are beyond the scope of the Retail Access Optimization Initiative. By its

very nature, such information is irrelevant to the Initiative and would shed no light on the request in this docket.<sup>5</sup>

Moreover, the compilation of cost and revenue data for approximately 1900 stations and branches that are outside the scope of the RAO Initiative would be unduly burdensome. The Commission will recall from Docket No. N2009-1 that cost and revenue data for many stations and branches are not recorded on a facility-specific basis in any central data system, but are recorded in local records and then rolled up for inclusion as part of the data for the Post Offices to which they report. Facility-specific data for these stations and branches must be manually culled from various local records at the District level and validated. The compilation and validation of data ultimately presented in USPS Library Reference N2009-1/19 in that docket was painstaking and took several months of effort before most of it could be presented. See Notice of the United States Postal Service Regarding Filing of Revision to Library Reference N2009-1/19 (December 1, 2009). The Postal Service objects to a similar undertaking in the instant docket, especially when all of the data requested by APWU/USPS-T1-2 relate to facilities outside of the scope of the RAO Initiative.

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<sup>5</sup> APWU can compile information responsive to subparts (a) and (c) of APWU/USPS-T1-2 by using the *Post Office Locations* tool at [www.usps.com](http://www.usps.com) described above.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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